

# Exhibit 39

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

ANDREW L. COLBORN, )  
)  
Plaintiff, )  
)  
vs. ) No. 19-CV-484  
)  
NETFLIX, INC., CHROME )  
MEDIA, LLC, f/k/a )  
SYNTHESIS FILMS, LLC, )  
LAURA RICCIARDI, and )  
MOIRA DEMOS, )  
)  
Defendants. )  
----- )

\* \* \* C O N F I D E N T I A L \* \* \*

June 30, 2022

10:40 a.m.

Deposition of MARY MANHARDT, held at  
the offices of Veritext, 7 Times Square, New  
York, New York, pursuant to subpoena and  
notice, before Laurie A. Collins, a Registered  
Professional Reporter and Notary Public of the  
State of New York.

1 to Miles scanning the 2007-'15 SA case file pulls  
2 for you.

3 Do you see that?

4 A. Yes.

5 Q. Was it your understanding that was a 03:10:40  
6 reference to the civil case file materials?

7 MR. VICK: Objection, lacks foundation,  
8 calls for speculation.

9 A. I have no idea. But, again, because  
10 this is -- it might have been any, I don't know, 03:10:56  
11 post-conviction stuff. I really don't have a  
12 clue. But it was for 8 that became 10.

13 Q. I'm just trying to figure out how much  
14 of the various court file materials you reviewed  
15 with respect to the various cases. 03:11:21

16 What do you recall -- strike that.

17 Do you recall having, for example, for  
18 the Avery civil case access at any time to all of  
19 the case file materials that were obtained from  
20 the civil case clerk? 03:11:36

21 A. No. If I were to go through all that  
22 stuff, we'd still be editing. It was -- it was --  
23 that is outside the editor's purview. I will say,  
24 however, that when -- any time I had a question  
25 about chronology, Laura brought in all the 03:11:55

C E R T I F I C A T E

STATE OF NEW YORK )

: ss.

COUNTY OF NEW YORK )

I, LAURIE A. COLLINS, a Registered  
Professional Reporter and Notary Public  
within and for the State of New York, do  
hereby certify:

That MARY MANHARDT, the witness whose  
deposition is hereinbefore set forth, was  
duly sworn by me and that such deposition  
is a true record of the testimony given by  
the witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage and that I am  
in no way interested in the outcome of this  
matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 13th day of July 2022.



LAURIE A. COLLINS, RPR